

**IN THE UNITED STATES FEDERAL DISTRICT COURT FOR THE NORTHERN
DISTRICT OF OHIO**

ERIKA KINSEY,	:	CASE NO. 5:21-CV-01627-SL
	:	
Plaintiff	:	JUDGE SARA LIOI
	:	
v.	:	
	:	JOINT STATUS REPORT
WATER FOR LIVING, LLC	:	
d/b/a CBD LIVING,	:	
	:	
Defendant	:	

PLAINTIFF’S STATUS REPORT

NOW COMES, Plaintiff, Erika Kinsey, by and through undersigned counsel and Bassi, Vreeland & Associates, P.C., files the within Status Report pursuant to the Court’s June 29, 2022 Order (Doc # 22), and state and aver the following:

1. This is the second Status Report filed by the Plaintiff.
2. Plaintiff attempted to confer with Defendant, through counsel, to file a Joint Report, but was unsuccessful in reaching Defense counsel prior to the deadline for filing the within Status Report.
3. Since the June 29, 2022 Case Management Conference, discovery has occurred. Plaintiff and Defendant have exchanged and responded to written interrogatories, requests for production of documents, and requests for admission. In addition, the Parties have conducted depositions of Plaintiff, Erika Kinsey, Plaintiff’s husband, Daniel Kinsey, and representatives from the Defendant, Sean McDonald, Bill DiSegna, and Virginia Provencio. Currently, the only outstanding discovery matter is the production of certain financial information from Defendant pursuant to a stipulated protective order. Said stipulation was executed by Defendant through counsel on August 9, 2022 and by Plaintiff through counsel on August 15, 2022.

4. Settlement discussions have occurred during the reporting period. Plaintiff substantially lowered her demand after completion of party depositions. Plaintiff awaits Defendant's counter-offer.

5. No motions have been filed during the reporting period, nor do any motions remain pending during the reporting period.

6. No developments have arisen that may give rise to a request to deviate from the schedule outlined in the Case Management Plan and Trial Order. Fact Discovery continues and shall expire on August 26, 2022 pursuant to the June 29, 2022 Case Management Plan. The parties are working diligently to avoid any deviations from the schedule. Further, the parties expect to be able to amicably resolve any discovery disputes that may arise, and have mutually agreed to continue to supplement fact discovery beyond the August 26, 2022 deadline without disrupting the remaining dates set forth on the Case Management Plan.

Respectfully Submitted,

By: /s/ Corey S. Young, Esq.
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